## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et al.,	)	
Plaintiffs	)	
٧.	) C.A. No. 05-39	99-JJF
STANDEY TAYLOR, et al.,	)	FILED
Defendants	)	JUN -6 2006
	MOTION TO BE REMOVED FROM LAWSUIT OF JAMES A. WILSON	U.S. DISTRICT COURT DISTRICT OF DELAWARE

COME NOW, George A. Jackson, one of 11 remaining plaintiffs in the above reference case, hereby request that the Court removed my name from the case for the following:

- 1. Since the filing of the above-reference lawsuit, I have been experiencing an active and ongoing conspiracy by representives of the Defendants to retaliate against me for being part of a lawsuit.
- 2. Pat Ditto and Donna Furman are employed as counselors for Department of Correction. They both was amended to the lawsuit, but was leter removed from the lawsuit. Both Ditto and Furman have read the lawsuit and are fully aware of the remaining 11 plaintiffs.
- 3. During the intial filing of the lawsuit, plaintiffs (except Nathan Henry) were housed in the Merit Building, which is considered an honor building based on living conditions being better than any other building here at the prison.
- 4. Once fired or quit from a job in the Merit Building, an inmate can be reassign to a different job, or written up and removed out of the building. Plaintiffs Wilson, Serpa, Brown, Green, Parker, and Potts have been moved from the Merit Building from bogus firing since the filing of the lawsuit.
- 5. I have been threatening to be sent to a different prison, denied a job that was offer to me based on my skill and education background, and intentionally denied equal treatment for my name being on the lawsuit. Although having a prison job is

a privilege, not a right. I have earned that privilege to have a more desirable job based on my work performance over  $13\frac{1}{2}$  years I have been working in the less desirable job, the prison kitchen. Over the last two years, representives of the Defendants have classifying numerous of inmates out of the kitchen to more desirable jobs, whereas I have beeb denied.

- 6. These ongoing retaliatory actions by representatives of the Defendants are aim at detering other inmates housed at the Merit Building from filing grievances and lawsuits. In fact, many of the plaintiffs signed off because of fear of retaliation from DOC staff. I have been harass, intimidated and punish for exercising my constitutional rights, and I have an immient fear for my life and safety. I have suffered weight loss, humiliation and emotional distress.
- 7. Wherefore, Plaintiff prays the Court removed him from said lawsuit out of continuing fear of retaliation from representatives of defendants.

8. Attached "Affidavit".

George A. Jackson

Sussex Correctional Institution

PIO. Box 500

Georgetown, DE 19947

I have read the above matter and have experience similar retaliatory acts by representatives of the Defendants through job placement and classisication for reason that I am plaintiff in this lawsuit. I further ask to be removed from said lawsuit out of fear of continuing retaliatory actions.

CERTIFICATE OF SERVICE

I, George N. Jackson, certify that on June 2, 2006, I mailed a copy of the attache Motion by placing said copy in the mail box at SCI prison mailbox to be forward to the following:

Lisa Barchi #3927 Deputy Attorney General Carvel State Office Building 820 N. French Street, 6th floor Wilmington, DE 19801

Messo Halsen

6/2/06

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et al,

Plaintiffs,

V.

C.A. No. 05-399-JJF

STANLEY TAYLOR, et al.,

Defendants .

## AFFIDAVIT OF GEORGE A. JACKSON

I, George A. Jackson, do hereby depose and state the following:

- 1. I am an inmate at the Sussex Correctional Institution serving a sentence of 35 years at level 5. I have worked in the prison kitchen since 1992.
- 2. I have never asked for a job change, been fired from a job, nor recieve any write-up for poor performance.
- 3. In October of 2005, I asked counselor Furman could I be put in for a prison modification of sentence. I was denied by Furman. She stated that "they" do not put inmates in for modification, and your name must come from the central office. But during the same time, counselor Furman and Ditto personally submitted two inmates for modification of sentence, but told me they do not do that anymore.
- 4. On February 27, 2006, counselor Ditto over-rode my classification to the Merit Building, and recommended me to being sent to Delaware Correctional Center for bogus reasons. The next Board denied counselor Ditto recommendation.
- 5. On April 27, 2006, I was asked by counselor Furman did I want to work in the law library. the law library staff requested me. Counselor Ditto denied me. Counselor Furman stated, "I was not a good canidate.
  - 6. I have made these statements based upon my personal knowledge.

Signed under the penalty of perjury.

6/2/06

"AFFIDAVIT"

